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R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 112  
Trenton, New Jersey 08625  
Attorney for Defendants Gurbir S. Grewal and Patrick J. Callahan

By: Marvin L. Freeman (ID 045441995)  
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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
VICINAGE OF CAMDEN

MAURICE GORDON, SR.,	:	HON. KAREN M. WILLIAMS, U.S.D.J
individually and as	:	HON. ANN MAIRE DONIO, U.S.M.J.
Administrator of the ESTATE OF	:	
MAURICE GORDON, JR., and	:	CIVIL ACTION NO. 21-4861
RACQUEL BARRETT,	:	(KMW-AMD)
	:	
Plaintiffs,	:	<u>CIVIL ACTION</u>

v.

**DEFENDANTS' INITIAL DISCLOSURES  
PURSUANT TO FED.R.CIV.P.26**

RANDALL WETZEL; GURBIR S.  
GREWAL; PATRICK J. CALLAHAN;  
and JOHN/JANE DOES 1-10, being  
fictitious names for persons  
whose identities are presently  
unknown, individually,

Defendants.

TO: William O. Wagstaff, III, Esq.  
The Wagstaff Firm, PC  
75 South Broadway  
Suite 400  
White Plains, New York 10601

Neal Wiesner, Esq.  
Wiesner Law Firm, PC  
34 East 23<sup>rd</sup> Street  
6<sup>th</sup> Floor  
New York, New York 10010

**Pursuant to Fed. R. Civ. P. 26**, Defendants, Gurbir S. Grewal and Patrick J. Callahan, make their mandatory initial disclosures as follows:

**A. INDIVIDUALS WITH DISCOVERABLE INFORMATION:**

1. Plaintiff, Maurice Gordon, Sr., address unknown;
2. Plaintiff, Racquel Barrett, address unknown;
3. Defendant, Randall Wetzels; c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
4. Defendant, Gurbir S. Grewal, c/o the Richard J. Hughes Justice Complex, 25 Market Street, PO Box 112, Trenton, New Jersey 08625;
5. Defendant, Patrick J. Callahan, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
6. Witness, Isaiah Lindsey, 26 Miron Drive, Poughkeepsie, New York;
7. Witness, Dispatcher Jeffrey Queipo, c/o Dutchess Combined Dispatch; Dutchess County, New York;
8. Witness, Dispatcher Dorothy Hill, c/o Poughkeepsie Police Department, Poughkeepsie, New York and/or Dutchess Combined Dispatch; Dutchess County, New York;
9. Witness, Dispatcher Thomas Fry, c/o Dutchess Combined Dispatch; Dutchess County, New York;
10. Witness, Police Officer Stanley Balmer, Red Bank Police Department, c/o Red Bank Police Department;

11. Witness, Trooper Hugh Meehan, Badge #7779, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
12. Witness, Daniel, Last Name Unknown, Passerby Motorist, phone number 732-749-XXXX;
13. Witness, Dispatcher Rebecca Mcalary, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
14. Witness, Dispatcher Angela Brown, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
15. Witness, Trooper Charles Olsen, Badge #7911, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
16. Witness, Trooper Randall Stallworth, Badge #7805, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
17. Witness, Dispatcher Gavin Zottman, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
18. Witness, Dispatcher Tiffany Brown, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
19. Witness, Dispatcher Noelle Russo, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
20. Witness, Trooper Zane Nestlerode, Badge #8052, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
21. Witness, Trooper Mark Negowetti, Badge #7515, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
22. Witness, Dispatcher Julie Bondinello, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;

23. Witness, Dispatcher Rachel Jablon, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
24. Witness, Dispatcher Anthony Grande, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
25. Witness, Trooper Gary Billyer, Badge #7971, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
26. Witness, Lieutenant Patrick Burns, Badge #5566, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
27. Witness, Detective Sergeant First Class Eric Crain, Badge #6296, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
28. Witness, Sergeant First Class Daniel Delucia, Badge #6072, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
29. Witness, Detective Sergeant First Class Carmen DiNovi, Badge #5861, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
30. Witness, Captain David Yanstick, Badge #5233, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
31. Witness, Trooper David Bellay, Badge #8112, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
32. Witness Trooper Matthew Litterio, Badge #6918, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
33. Witness, Trooper James Muhlenbruck, Badge #7783, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
34. Witness, Sergeant John Nolfo, Badge #6468, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;

35. Witness, Trooper Didier Paul, Badge #7243, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
36. Witness, Trooper Patrick McManus, Badge #7510, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
37. Witness, Trooper Jay Amato, Badge #7566, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
38. Witness, Trooper Stephen Hnida, Badge #7753, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
39. Witness, Detective Sergeant Thomas Holmes, Badge #6912, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
40. Witness, Trooper Lawrence Marandino, Badge #7128, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
41. Witness, Detective Rigoberto Onofre, Badge #7420, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
42. Witness, Trooper Paul Ciervo, Badge #7730, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
43. Witness, Trooper Fernando Gensollen, Badge #7481, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
44. Witness, Sergeant Michael Liotti, Badge #6304, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
45. Witness, Detective Scott Tetzlaff, Badge #7156, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;

46. Witness, Sergeant Gregg Anacker, Badge #6536, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
47. Witness, Trooper Adam Harchetts, Badge #7626, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
48. Witness, Lieutenant John Cunningham, Badge #4782, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
49. Witness, Sergeant First Class Justin Hanna, Badge #6573, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
50. Witness, Trooper George Silvestro, Badge #8090, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
51. Witness, Trooper Leonardo Arcos, Badge #7963, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
52. Witness, Sergeant James Dever, Badge #5579, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
53. Witness, Trooper Jeffery Kelly, Badge #8017, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
54. Witness, Dispatcher Thomas Toolan, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
55. Witness, Dispatcher Martin Isler, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
56. Witness, Dispatcher Robert Geiling, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
57. Witness, Staff Sergeant Pietro Macauda, Badge #6107, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;

58. Witness, Dispatcher Denise Ferraro, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
59. Witness, Dispatcher Vanessa Kamaras, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
60. Witness, Trooper Patrick McManus, Badge #7510, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
61. Witness, Dispatcher Dawn Marchalewicz, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
62. Witness, Dispatcher Ashley Grabert, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
63. Witness, Sergeant Christopher O'Connor, Badge #7056, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
64. Witness, Dispatcher Cathleen McFadden, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
65. Witness, Trooper Dennis Hicks, Badge #6911, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
66. Witness, Sergeant Kristopher Arnold, Badge #6437, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
67. Witness, Trooper Christopher Jones, Badge #6508, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
68. Witness, Trooper Geoffrey Navarro, Badge #7419, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;

69. Witness, Trooper Junior Plaza, Badge #8068, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
70. Witness, Sergeant Louis Pakovics, Badge #7241, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
71. Witness, Trooper Adam Harchetts, Badge #7626, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
72. Witness, Trooper Charles Bowden, Badge #6663, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
73. Witness, Trooper Vincent Kokotajlo, Badge #8191, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
74. Witness, Staff Sergeant Brian Brennan, Badge #5033, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
75. Witness, Det. Alison Akke, c/o New Jersey Division of Criminal Justice, Office of the Attorney General, RJ Hughes Justice Complex, 25 Market Street, Trenton, New Jersey 08625;
76. Witness, Det. Little Trenard, c/o New Jersey Division of Criminal Justice, Office of the Attorney General, RJ Hughes Justice Complex, 25 Market Street, Trenton, New Jersey 08625;
77. Witness, Stephen M. Deady, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
78. Witness, Detective Sergeant Edward Burek, Badge #6835, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
79. Witness, Detective Michael Muckley, Badge #7235, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
80. Witness, Detective John Menafrá, Badge #7781, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;



81. Witness, Detective Sergeant Kevin Mahon, Badge #6326, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
82. Witness, Detective Michael Vasil, Badge #6765, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
83. Witness, Detective Richard Echevarria, Badge #6985, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
84. Witness, Lieutenant William Dineen, Badge #5581, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
85. Witness, Detective Sergeant John Weber, Badge #7079, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
86. Witness, Motorist Christopher Vesper, address unknown;
87. Witness, Wawa Gas Attendant Joseph Traphagen, address unknown;
88. Witness, Wawa cashier Regina Davies, address unknown;
89. Witness, Motorist Matthew Verg, 134 East Schellenger Avenue, Wildwood, New Jersey 08620;
90. Witness, Motorist Michael Cipollono, 134 East Schellenger Avenue, Wildwood, New Jersey 08620;
91. Witness, Tow Truck Driver Joseph Nicholson, address unknown;
92. Witness, Paramedic Patricia Russell, AtlantiCare Regional Medical Center, address unknown;
93. Witness, Paramedic Tyler Wilson LaChance, AtlantiCare Regional Medical Center, address unknown;
94. Witness, Tow Truck Driver Christopher Morris, address unknown;
95. Witness, Trooper Christopher Ballester, Badge #8275, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;

96. Witness Trooper Phillip Ragan, Badge #8347, c/o New Jersey State Police, Division Headquarters, River Road, PO Box 7068, West Trenton, New Jersey 08628;
97. Witness, Assistant Medical Examiner Peter M. Mazari, M.D., Ph.D., c/o State of New Jersey, Department of Health, Office of the Chief State Medical Examiner, Southern Regional Medical Examiner Office, Woodbine Development Center, 1175 Dehirsch Avenue, Woodbine, New Jersey 08270-2401;
98. Witness, Forensic Toxicologist Ralph Gagliano, c/o State of New Jersey, Department of Health, NJ State Medical Examiner Toxicology Laboratory, Edwin H. Albano Institute of Forensic Science, 325 Norfolk Street, Newark, New Jersey 07103-2701;
99. Witness, Forensic Toxicologist Laura M. Labay, Ph.D., F-ABFT, DABCC-TC, c/o NMS Labs, 200 Welsh Road, Horsham, PA 19044-2208;
100. Witness, Medical Technician William Smith, c/o State of New Jersey, Department of Health, Office of the Chief State Medical Examiner, Southern Regional Medical Examiner Office, Woodbine Development Center, 1175 Dehirsch Avenue, Woodbine, New Jersey 08270-2401;
101. Witness, Medical Technician Colleen Greco, c/o State of New Jersey, Department of Health, Office of the Chief State Medical Examiner, Southern Regional Medical Examiner Office, Woodbine Development Center, 1175 Dehirsch Avenue, Woodbine, New Jersey 08270-2401;
102. Witness, Custodian of Records Thomas Gaffney, c/o Verizon, 180 Washington Valle Road, Bedminster, New Jersey 07921;
103. Witness, Nikia Singleton, Health Information Management, c/o Rockland Psychiatric Center, 140 Old Orangeburg Road, Orangeburg, New York 10962;
104. Witnesses, any and all mental health providers referenced in medical records from Rockland Psychiatric Center, 140 Old Orangeburg Road, Orangeburg, New York 10962;
105. All individuals named in Plaintiffs' Rule 26 Disclosures;

106. All persons named in any pleading, discovery responses, documents produced in discovery, or tort claim notice or any attachments to any such documents.

Defendants reserve the right to supplement and amend this information during the course of discovery.

**B. RELEVANT DOCUMENTS AND THINGS**

**The following documents comprising the Shooting Response Team (SRT) Investigation are in Defendants' possession at this time, but they cannot be produced until the conclusion of the presentation of the underlying matter to a Grand Jury, as they are the subject of the Court's January 25, 2022 Order concerning discovery involving Co-Defendant Wetzel:**

1. New Jersey Turnpike Authority, Parkway Division, South Shore Towing, Invoice Number SS21874 for road service provided to Maurice Gordon at 5:38 am, dated May 23, 2020;
2. New Jersey State Police Reportable Use of Force Report prepared by Sergeant Wetzel, Badge #6389, dated May 23, 2020;
3. New Jersey State Police Patrol Charts of responding/assisting troopers, May 23, 2020;
4. New Jersey State Police Crime Scene Investigation Report for Case Number CSI2020-00312 of Detective Michael Muckley, dated May 27, 2020;
5. New Jersey State Police thumbnail Crime Scene Photos, photos 1-210, taken by Detective Michael Muckley;
6. New Jersey State Police thumbnail Crime Scene Photos, photos 211-360, taken by Detective Michael Muckley;
7. New Jersey State Police Crime Scene Investigation Report for Case Number CSI2020-00312 of Detective Michael Vasil, dated June 10, 2020;
8. New Jersey State Police Crime Scene Evidence Log for evidence item numbers MTV1-MTV12 for evidence recovered by Detective Michael Vasil on May 23, 2020 and turned over to Detective Little Trenard, Badge #2158 of the Division of Criminal Justice on May 23, 2020;

9. Chain of Custody report for various items collected by Detective Michael Vasil;
10. New Jersey State Police Crime Scene Investigation Report for Case Number CSI202000312 of Detective Richard Echevarria, dated June 6, 2020;
11. New Jersey State Police Crime Scene Evidence Log for evidence item numbers RE28-RE45 recovered by Detective Richard Echevarria on May 24, 2020 and turned over to Detective Alison Akke, Badge #2178 of the Division of Criminal Justice on May 24, 2020;
12. New Jersey State Police Crime Scene Evidence Log for evidence item numbers RE01-RE27 recovered by Detective Richard Echevarria on May 23, 2020 and turned over to Detective Little Trenard, Badge #2158 of the Division of Criminal Justice on May 23, 2020;
13. Chain of Custody Report for various items collected by Detective Echevarria;
14. New Jersey State Police Crime Scene Photographic Log for 1 photograph of evidence Item RE45 taken by Det. Richard Echevarria;
15. New Jersey State Police Crime Scene Investigation Report for Case Number CSI202000312 of Detective Sergeant Eric Crain, Badge #6296, dated June 16, 2020;
16. New Jersey State Police Crime Scene Investigation Report for Case Number CSI202000312 of Detective Sergeant Kevin Mahon, Badge #6326, dated June 16, 2020;
17. New Jersey State Police Crime Scene Entry/Exit Log;
18. New Jersey State Police Central Regional Laboratory Evidence Return Receipt for evidence relinquished by Lauren Perdue to Detective Akke on April 22, 2021;
19. New Jersey State Police Crime Scene Photos taken by Detective Sergeant Kevin Mahon, Badge #6326;
20. New Jersey State Police Crime Scene Photos taken by Detective Michael Muckley, Badge #7235
21. New Jersey State Police Crime Scene Photo taken by Detective Richard Echevarria, Badge #6985;

22. New Jersey State Police Ballistics Unit Evidence Receipt for Case Number 2020-00016-SRT, Laboratory Number B20-0869, for ballistics evidence delivered on May 27, 2020 for examination by Detective Little Trenard, Division of Criminal Justice and received by Rex Ur;
23. New Jersey State Police Ballistic Unit Evidence Return Receipt for Case Number 2020-00016-SRT, Laboratory Number B20-0869, for ballistics evidence relinquished by William R. Magann to Det. Alison Akke, Badge #2178, Division of Criminal Justice on August 10, 2020;
24. New Jersey State Police, Office of Forensic Sciences, Forensic Services Bureau, Ballistics Unit Laboratory Report, Laboratory Number B20-0869, Agency Case Number 2020-00016-SRT prepared by Stephen M. Deady and reviewed/verified by Detective Sergeant Edward Burek, dated June 16, 2020;
25. Letter from Detective Alison Akke, Badge #2178, State of New Jersey, Office of the Attorney General, Division of Criminal Justice to Southern Regional Medical Examiner Officer, dated May 28, 2020 requesting a copy of the Autopsy Report for Maurice Gordon, Jr.;
26. Autopsy Report of Peter M. Mazari, M.D., Ph.D., Assistant Medical Examiner, State of New Jersey, Department of Health, Office of the Chief State Medical Examiner, Southern Regional Medical Examiner Office, Woodbine Developmental Center, dated June 25, 2020;
27. Toxicology Report of Forensic Toxicologist Ralph Gagliano, State of New Jersey, Department of Health, NJ State Medical Examiner Toxicology Laboratory, Edwin H. Albano Institute of Forensic Science, dated June 2, 2020;
28. Additional Toxicology Report of Forensic Toxicologist Ralph Gagliano, State of New Jersey, Department of Health, NJ State Medical Examiner Toxicology Laboratory, Edwin H. Albano Institute of Forensic Science, dated June 25, 2020;
29. Toxicology Report of Laura M. Labay, Ph.D., F-ABFT, DABCC-TC, NMS Labs, dated June 24, 2020;
30. Autopsy Evidence Receipt, State of New Jersey, Department of Health, Office of the Chief State Medical Examiner, Southern Regional Medical Examiner Office, Woodbine Developmental Center, signed by William Smith, dated May 24, 2020;

31. Post Chain of Custody Receipt, State of New Jersey, Department of Health, Office of the Chief State Medical Examiner, Southern Regional Medical Examiner Office, Woodbine Developmental Center, signed by William Smith, dated May 24, 2020;
32. AtlantiCare Regional Medical Center EMS Run Report, dated May 23, 2020;
33. Clear database search results for the name "Maurice Gordon" conducted on May 23, 2020;
34. E-JusticeNY Integrated Justice Portal, Criminal History Repository Inquiry for Maurice Gordon conducted on May 23, 2020;
35. Vehicle Detection Report for License Plate NY HPF5883 between January 23, 2020 and May 13, 2020, created on May 23, 2020;
36. Regional Domain Awareness System Report for License Plate NY HPF5883, created on May 23, 2020;
37. Regional Domain Awareness System Report for License Plate NY HPF5883, additional results, created May 23, 2020;
38. NCIC Offline Search for Maurice Gordon conducted on May 23, 2020;
39. CJIS/NCIC 2000 Response Report for Maurice Gordon conducted on May 23, 2020;
40. Grand Jury Subpoena Duces Tecum to AtlantiCare Regional Medical Center for the medical records of Randall Wetez1 from May 23, 2020, dated June 11, 2020;
41. Grand Jury Subpoena Duces Tecum to AtlantiCare Regional Medical Center for the medical records of Maurice Gordon from May 23, 2020, dated June 11, 2020;
42. AtlantiCare Regional Medical Center medical records for Randall Wetz1, dated May 23, 2020;
43. Affidavit in Support of a Search Warrant for the search of Maurice Gordon's vehicle, prepared by Detective Alison Akke, Division of Criminal Justice, New Jersey Attorney General's Shooting Response Team, dated May 23, 2020;

44. Order for Search Warrant prepared by Detective Alison Akke, Division of Criminal Justice, New Jersey Attorney General's Shooting Response Team, dated May 23, 2020;
45. Text Messages sent from Randall Wetzel from his personal cellphone to another trooper between 6:20 am and 7:58 am, dated May 23, 2020;
46. Video footage and still photo from the Barnegat Toll Plaza, Lane 2, at 6:09 am on May 23, 2020;
47. Wawa surveillance video from May 23, 2020;
48. New Jersey State Police Investigation Report H650-2020-00012, Major Crime South Unit prepared by Detective J. Menafrá, Badge #7781, dated June 16, 2020;
49. New Jersey State Police Supplemental Investigation Report H650-2020-00012 prepared by Sergeant Wetzel, dated June 16, 2020;
50. New Jersey Regional Computer Forensics Laboratory Report for the proper orientation and forensic analysis of the DVD+R containing the DIVR recordings from Sergeant Wetzel's Troop Car, GSP327, clips 1 and 2 from camera 2 between 7:07 am and 7:09 am, prepared by Raymond Salapka, dated June 24, 2020;
51. New Jersey Regional Computer Forensics Laboratory still photographs from the DIVR recordings from Sergeant Wetzel's Troop car, clips 1 and 2 from camera 2, between 7:07 am and 7:09 am, properly oriented, saved June 4, 2020;
52. New Jersey Regional Computer Forensics Laboratory Report for the still photographs from the DIVR recordings from Sergeant Wetzel's Troop car, clips 1 and 2 from camera 2, between 7:07 am and 7:09 am, properly oriented, created June 4, 2020;
53. New Jersey Regional Operations Intelligence Center, Cyber Threat Intelligence Unit, Tactical Open Source Intelligence Report for the search of the online/social media accounts of Maurice Gordon, prepared by Detective Christofferson Clerge, Badge #7378, New Jersey State Police, dated May 28, 2020;
54. Affidavit in Support of Application for Court Order for Medical Records of Maurice Gordon from the Dutchess Mental Health Clinic prepared by Detective Alison Akke, Badge #2178, Division of Criminal Justice/New Jersey Attorney General's



Shooting Response Team and drafted Court Order, dated June 30, 2020;

55. Letter from Detective Alison Akke, Badge #2178, Division of Criminal Justice/New Jersey Attorney General's Shooting Response Team to the Dutchess County Clerk's Office enclosing a Court Order to be served in New York, dated July 13, 2020;
56. Affidavit of Service of a New Jersey Court Order for Medical Records of Maurice Gordon from the Dutchess Mental Health Clinic Served by the Dutchess County Sheriff's Office, dated July 15, 2020;
57. Rockland Psychiatric Center Medical Records for Maurice Gordon, Jr.;
58. County of Dutchess, Department of Emergency Response, Application for Access to Records submitted by Detective Allison Akke, Division of Criminal Justice, New Jersey Attorney General's Shooting Response Team, dated May 27, 2020;
59. Search Warrant and Communications Data Warrant for the Verizon Cellphone Records of Maurice Gordon, Jr. prepared by Detective Allison Akke, Division of Criminal Justice, New Jersey Attorney General's Shooting Response Team, dated May 28, 2020;
60. Affidavit of Applicant for a Search Warrant and Communications Data Warrant for Maurice Gordon's cellphone records prepared by Detective Allison Akke, Division of Criminal Justice, New Jersey Attorney General's Shooting Response Team, dated May 28, 2020;
61. Certification of DAG James Rubertson for his review of the Affidavit of Application and proposed Communications Data Warrant prepared by Detective Allison Akke, Division of Criminal Justice, New Jersey Attorney General's Shooting Response Team, dated May 28, 2020;
62. Verizon Security Assistance Team (VSAT) acknowledgement of receipt of the Search Warrant for Case Number 2000139184, not dated;
63. Maurice Gordon, Jr.'s cellphone records/data provided by Verizon pursuant to a Communications Data Warrant;



64. First Recorded Statement of Sergeant Randall Wetzel taken on May 23, 2020;
65. Second Recorded Statement of Sergeant Randall Wetzel taken on May 29, 2020;
66. Statement of Trooper Didier Paul taken on May 23, 2020;
67. Statement of Trooper Jay Amato taken on May 23, 2020;
68. Statement of Trooper Lawrence Marandino taken on May 23, 2020;
69. Statement of Trooper Patrick McManus taken on May 23, 2020;
70. Statement of Trooper Randall Stallworth taken on May 23, 2020;
71. Statement of Trooper Adam Harchetts taken on May 23, 2020;
72. Statement of Trooper Gary Billyer taken on May 23, 2020;
73. Statement of Sergeant Gregg Anacker taken on May 23 2020;
74. Statement of Trooper George Silvestro taken on May 23, 2020;
75. Statement of Trooper David Bellay taken on May 23, 2020;
76. Statement of Trooper Stephen Hnida taken on May 23, 2020;
77. Statement of Staff Sergeant Pietro Macauda taken on May 23, 2020;
78. Statement of Trooper Charles Olsen taken May 23, 2020;
79. Statement of Trooper Leonardo Arcos taken on May 23, 2020;
80. Statement of Trooper Jeffery Kelly taken on May 23, 2020;
81. Statement of Trooper Matthew Litterio taken on May 23, 2020;
82. Statement of Trooper Paul Ciervo taken on May 23, 2020;
83. Statement of Christopher Morris taken on May 23, 2020;
84. Statement of Trooper Christopher Ballester taken on May, 23, 2020;
85. Statement of Christopher Vesper taken on May 23, 2020;

86. Statement of Trooper Mark Negowetti taken on May 23, 2020;
87. Statement of Matthew Verg taken on May 26, 2020;
88. Statement of Michael Cipollono taken on May 26, 2020;
89. Statement of Trooper Hugh Meehan taken on May 27, 2020;
90. Statement of Officer Stanley Balmer taken on May 27, 2020;
91. Statement of Trooper Phillip Ragan taken on May 27, 2020;
92. Statement of Joseph Nicholson taken on May 28, 2020;
93. Statement of Sergeant Michael Liotti taken on May 29, 2020;
94. Statement of Joshua Traphagen taken on May 29, 2020;
95. Statement of Regina Davies taken on June 1, 2020;
96. Statement of Patricia Russel, date taken unknown;
97. Statement of Tyler Wilson LaChance, date taken unknown;
98. Dutchess Combined Dispatch, Dutchess County, Call for Service Detail Report - CFS 8578, created on May 22, 2020 at 3:23 am by caller Isaiah Lindsey regarding Maurice Gordon, Jr.;
99. 911 Recording of Isiah Lindsey to the Dutchess County Combined Dispatch Call Center on May 22, 2020 regarding Maurice Gordon, Jr.;
100. 911 Recording of Isiah Lindsey to the Poughkeepsie Police Department on May 22, 2020 regarding Maurice Gordon, Jr.;
101. Poughkeepsie Police Department Incident and CAD Report for Incident Number 2020-00027929, dated May 23, 2020 for a welfare check call by Lsaiah Lindsey;
102. Red Bank Police Department Incident Data Sheet 20-06771, dated May 23, 2020 of Officer Stanley Balmer, Badge #216 for a Motorist Aid call at 3:23 am involving Maurice Gordon, Jr.;
103. New Jersey State Police CAD Abstract Report E050-2020-00487690, dated May 23, 2020 for a Motorist Aid Call involving Maurice Gordon, Jr. received at 3:06 am and to which Trooper Meehan arrived on scene at 3:32 am;

104. New Jersey State Police CAD Abstract Report E030-2020-00487847, dated May 23, 2020 for an Abandoned Vehicle/Vessel call involving Maurice Gordon, Jr. received at 4:54 am and to which Trooper Charles Olsen responded;
105. New Jersey State Police CAD Abstract Report T803-2020-00488136 for a Motor Vehicle Stop involving Maurice Gordon, Jr. by Trooper Mark Negowetti at 6:13 am;
106. New Jersey State Police CAD Abstract Report T803-2020-00488194 for a Motor Vehicle Stop involving Maurice Gordon, Jr. by Sergeant Randall Wetzels at 6:28 am;
107. May 23, 2020 DIVR Recording from Red Bank Officer Stanley Balmer's police car at approximately 3:23 am;
108. May 23 2020 DIVR Recordings from Trooper Meehan's troop car from approximately 3:32 am to approximately 4:25 am;
109. May 23, 2020 DIVR Recordings from Trooper Olsen's troop car from approximately 4:53 am to approximately 5:17 am;
110. May 23, 2020 DIVR Recording from Trooper Negowetti's troop car from approximately 6:13 am to approximately 6:23 am;
111. May 23, 2020 DIVR Recordings from Sergeant Wetzels troop car;
112. Radio Transmissions on May 23, 2020 and Dispatch Recordings for EMS/BLS Services on May 23, 2020;
113. May 23, 2020 DIVR Recordings from responding/assisting Troopers Billyer, Burns, Crain, Delucia, DiNovi, Yanstick, Bellay, Litterio, Muhlenbruck, Nolfo, Paul, McManus, Stallworth, Amato, Hnida, Holmes, Marandino, Onofre, Ciervo, Gensollen, Liotti, Tetzlaff, Anakcer, Harchetts, Negowetti, Cunningham, Hanna, Silvestro, Arcos, Dever, and Kelly;
114. May 23, 2020 Body Worn Camera Recordings from responding/assisting Troopers Arcos, Bellay, Kelly and Silvestro;

**The following documents will be produced upon the entry of a Discovery Confidentiality Order:**

- 115. New Jersey State Police Standing Operating Procedure B22, Use of Force, effective December 9, 2015;
- 116. New Jersey State Police Standing Operating Procedure B13, Biased Based Policing, effective February 23, 2007;

**The following documents are publicly available on the New Jersey Attorney General's Website:**

- 117. Attorney General Use of Force Guidelines, revised June 2000;
- 118. Attorney General Directive 2020-13, Directive Revising Use of Force Policy and Procedures; dated December 21, 2020;
- 119. Attorney General Directive 2021-14, Directive Updated Statewide Use of Force Policy, dated December 28, 2021;
- 120. Attorney General Directive 2021-7, Revising Law Enforcement Training Requirements (use of force) for 2021, dated June 25, 2021;
- 121. Attorney General Directive 2015-1, Law Enforcement Directive Regarding Police Body Worn Cameras (BWCs) and Stored BWC Recordings, dated July 28, 2015;
- 122. Attorney General Directive 2021-5, Directive Revising Policy Regarding Use of Body Worn Cameras (BWCs) and Stored BWC Recordings, dated May 25, 2021;
- 123. Attorney General Directive 2022-1, Update to Body Worn Camera Policy, dated January 19, 2022;
- 124. Attorney General Directive 2019-4, Directive Ensuring the Independent Investigation of Criminal Cases Involving Police Use of Force or In Custody Deaths, dated December 4, 2019;
- 125. Attorney General Directive 2018-1, Law Enforcement Directive Concerning Public Release of Video Recordings Depicting Police Deadly Force Incidents, dated February 26, 2018;

**The following documents are publicly available in the OLEPS Library via the OLEPS link on the New Jersey Attorney General's Website:**

- 127. OLEPS 13<sup>th</sup> Aggregate Report of Traffic Enforcement Activities of the New Jersey State Police, dated January 2018;

128. OLEPS 14<sup>th</sup> Aggregate Report of Traffic Enforcement Activities of the New Jersey State Police, dated June 2018;
129. OLEPS 15<sup>th</sup> Aggregate Report of Traffic Enforcement Activities of the New Jersey State Police, dated August 2018;
130. OLEPS 13<sup>th</sup> Oversight Report, July 1, 2015-December 31, 2015, 2015 Annual Training Review, dated June 2018;
131. OLEPS 14<sup>th</sup> Oversight Report, January 1, 2016-June 30, 2016, February dated February 2019;
132. OLEPS 15<sup>th</sup> Oversight Report, July 1, 2016-December 31, 2016, 2016 Annual Training Review, dated May 2020;
133. OLEPS 16<sup>th</sup> Oversight Report, January 1, 2017-June 30, 2017, dated July 2021;
134. OLEPS 6<sup>th</sup> Public Aggregate Misconduct Report, dated June 2018;
135. OLEPS 7<sup>th</sup> Public Aggregate Misconduct Report, dated February 2019;
136. OLEPS 8<sup>th</sup> Public Aggregate Misconduct Report, January 1, 2018-December 31, 2018, dated May 2020;
137. OLEPS 9<sup>th</sup> Public Aggregate Misconduct Report, January 1, 2019-December 31, 2019;
138. OLEPS 13<sup>th</sup> Aggregate Report ERRATA, dated August 2018;
139. MV Stop Dashboard, a compilation of 6 million motor vehicle stops and stop related activities by members of the New Jersey State Police from January 1, 2009 to May 31, 2021;
140. Use of Force Dashboard;
141. Any and all documents listed in Plaintiffs' Rule 26 Disclosures.

Defendants reserve the right to supplement and amend this information during the course of discovery.

**C. INSURANCE AGREEMENTS IN FORCE**

The State of New Jersey does not have insurance, but has sufficient assets to satisfy any judgment that may be rendered

against it or any employee that is being represented and indemnified by the Attorney General of the State of New Jersey, pursuant to N.J.S.A. 59:1-1, et seq.

**D. STATEMENT OF BASIS FOR ANY DAMAGES CLAIMED**

Defendants deny that the Plaintiffs sustained any damages as a result of any improper actions on the part of Defendants.

**E. IDENTITY OF EXPERTS**

At this time, Defendants have not retained an expert in this matter, but reserve the right to do so if any are deemed necessary.

CHRISTOPHER A. EDWARDS  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Defendants

By: s/Marvin L. Freeman  
Marvin L. Freeman  
Deputy Attorney General

Dated: February 25, 2022